

GEORGIA M. PESTANA
Corporation Counsel

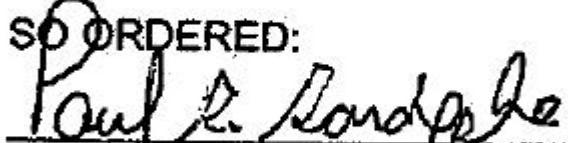
THE CITY OF NEW YORK
LAW DEPARTMENT
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NEW YORK NY 10007

MARTHA NIMMER
Special Assistant Corporation Counsel
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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

August 18, 2021

Dated: _____

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *N.A. obo M.A. v. N.Y.C. Dep't of Education*, 21-cv-2643 (PGG)(SLC)

Dear Judge Gardephe:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

With Plaintiff's consent, I write to respectfully request that the August 19, 2021 conference be adjourned *sine die*. This is the second request for an adjournment of the initial conference. The first request was made on June 15, 2021 and granted by Your Honor on June 17, 2021.

Additionally, the parties respectfully submit the following briefing schedule: Plaintiff to submit its motion for summary judgment by October 19, 2021; Defendant to submit its opposition papers 30 days following Plaintiff's submission, and Plaintiff to submit its reply papers 14 days after Defendant's opposition.

Accordingly, the parties respectfully request that the August 19, 2021 conference be adjourned *sine die* and that the briefing schedule indicated *supra* be entered by the Court.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Britton Bouchard, Esq. (via ECF)